

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

IN RE: RANBAXY GENERIC DRUG APPLICATION  
ANTITRUST LITIGATION

MDL No. 2878

THIS DOCUMENT RELATES TO:

All End-Payor Actions

Master File No.  
19-md-02878-NMG

**END-PAYOR PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF  
SETTLEMENT**

Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiffs United Food and Commercial Workers Health and Welfare Fund of Northeastern Pennsylvania (“UFCW”), Louisiana Health Service & Indemnity Company d/b/a Blue Cross and Blue Shield of Louisiana and HMO Louisiana, Inc. (“BCBSLA”) (collectively, the “Plaintiffs,”), on behalf of themselves and the certified End-Payor Classes they represent (the “End-Payor Classes” or “EPPs”), hereby move this Court for an Order: (i) approving the Settlement; (ii) approving the Plan of Allocation; (iii) finding notice of the Settlement to the Classes comports with the requirements of due process; (iv) finding all Class Members are bound by the Settlement Agreement; (v) releasing claims as set forth in the Settlement Agreement; (vi) retaining exclusive jurisdiction over the Settlement and this Settlement Agreement, including the administration and consummation of this Settlement; and (vii) directing claims be dismissed with prejudice.

The grounds for this Motion are set forth in the accompanying Memorandum of Law in Support of End-Payor Plaintiffs’ Motion for Final Approval of the Proposed Settlement, and the Joint Declaration of Gerald Lawrence, Esq. and James R. Dugan, II, Esq. in support of (A) End-Payor Class Plaintiffs’ Unopposed Motion for Final Approval of the Proposed Class Action

Settlement; and (B) Lead Class Counsel's Motion for an Award of Attorneys' Fees, Litigation Expenses, and Service Awards, dated June 27, 2022, and all Exhibits attached thereto. Defendants do not oppose the motion. The parties to the Settlement have agreed upon a proposed order granting the relief sought by this Motion that is attached herewith.

Dated: June 27, 2022

Respectfully submitted,

**LOWEY DANNENBERG, P.C.**

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End-Payor Classes*

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2022, a true copy of the foregoing document was served on all counsel of record by electronic transmission and/or electronically filing the document with the Court's CM/ECF system.

/s/Renee A. Nolan